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By Electronic Filing

Honorable J. Frederick Motz
United States District Judge
District of Maryland
United States Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

Re: (1) PracticeWorks, Inc., et al. v. Professional Software Solutions of Illinois, Inc., Civil No. JFM-02-1205
 (2) Practice Works, Inc., et al. v. Dental Medical Automation, Inc., Civil No. JFM-02-1206

Dear Judge Motz:

We represent Plaintiffs PracticeWorks, Inc. and SoftDent, LLC (“Plaintiffs”) in the above-referenced matters. We make a joint request with counsel for Defendants Professional Software Solutions of Illinois, Inc. and Dental Medical Automation, Inc. (“Defendants”) for the enclosed Stipulation to be So Ordered by the Court. The Stipulation, presented in the spirit of expeditious case management and avoiding the unnecessary expenditure of time and money, contains a proposed schedule for the parties to amend their pleadings and thereafter make any dispositive motions as to said amended pleadings.

On July 28, 2003, Defendants filed and served their Motion for Leave to File First Amended Counterclaims in the above-captioned actions, seeking to assert a Seventh Counterclaim for declaratory relief regarding Defendants’ ability to provide technical support and service and to assert Tenth and Eleventh Counterclaims for tortious interference with contract and tortious interference with prospective economic advantage, respectively. Thereafter, Plaintiffs’ counsel communicated to Defendants’ counsel Plaintiffs’ intention to file a First Amended Complaint containing a Fourth Count for breach of contract, a Fifth Count for copyright infringement and a Sixth Count for declaratory relief regarding Defendants’ inability to provide technical support and service through the use of Plaintiffs’ Software.

During the month of August, counsel met and conferred pursuant to Local Rule 103.6.d regarding the aforementioned amendments to their pleadings. In the interests of case management and litigation efficiency, Plaintiffs and Defendants agreed—pending Court approval—to obviate the necessity for motions for leave to amend by consenting to each other’s filing of the aforementioned amended pleadings, while reserving all rights to challenge the

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other's amended pleading and further reserving all rights to make any dispositive motion as to the amended pleadings.

Accordingly, the enclosed Stipulation provides for the following proposed dates: (i) on September 29, 2003, Defendants will withdraw their Motion for Leave to File First Amended Counterclaims; (ii) on September 30, 2003, Plaintiffs will file their First Amended Complaint in compliance with Local Rule 103.6(b) and (c); and (iii) on October 20, 2003, Defendants will file their First Amended Answer and Counterclaims in compliance with Local Rule 103.6(b) and (c).

As previously mentioned, the parties further have reserved their rights to make any dispositive motion as to the amended pleadings by no later than November 20, 2003, and, pending the Court's approval, have agreed that discovery shall be stayed until November 20, unless Plaintiffs and/or Defendants make a dispositive motion as to the amended pleadings by said date whereby it is agreed that discovery will be stayed pending the determination of said dispositive motion(s).

For all the foregoing reasons, the parties respectfully request that the Court approve the enclosed Stipulation.

Respectfully submitted,

/s/ Michael S. Gordon

Michael S. Gordon

MSG:jpб

cc: Howard E. Cotton (Plaintiffs' counsel)
Mark E. Wiemelt, Esq. (Defendants' counsel)
John M.G. Murphy, Esq. (Defendants' counsel)